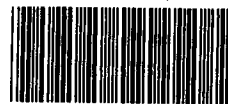




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106



SEMS DocID

2334583

In Reply Refer To: 3EN32

ORIGINAL
(Red)

SFP 23 1980

Mr. G. C. Kirkmyer
Liquid Waste Disposal, Inc.
P.O. Box 7217
Richmond, Virginia 23221

Dear Mr. Kirkmyer:

This is to confirm the information which we discussed last week concerning the applicability of various statutes administered by EPA to your facility. It is my understanding that your situation is: you operate an incinerator in which you treat, among other items, hazardous wastes; you are moving the incinerator intact to a new location; and you have notified EPA under RCRA for the present location.

It is my opinion that you should send the RCRA Part A application for this facility using the new location address, assuming that you are moved to that location before November 19, 1980. You should also indicate by letter with that submittal that the Part A is for the same facility as the August notification. This will insure a proper interim status determination.

The applicability of the Clean Water Act and Clean Air Act to the facility should first be discussed with the appropriate State agencies. I believe that the facility would not be considered a new source under any of EPA's regulations if it is being moved intact with no modifications which affect the operations or emissions.

If you have any further questions, please contact me at the above address or at (215) 597-8915.

Sincerely yours,

Ralph W. Siskind
Attorney, Legal Branch

ROUTING AND TRANSMITTAL SLIP

Date

10/6/80

TO: (Name, office symbol, room number,
building, Agency/Post)

Initials

Date

1.

2.

Bob Allen

3.

3AH30

4.

5.

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

Toxic & File

VA-56

ORIGINAL
(Red)

NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

3EN21

Room No.—Bldg.

Jim Harper

Phone No.

8211

8041-102

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206